

# **EXHIBIT D**

**From:** [Keith Mathews, Esq.](#)  
**To:** [Brass, Rachel S.](#)  
**Subject:** Re: 3:21-cv-05567-EMC Coronavirus Reporter et al v. Apple Inc. et al  
**Date:** Wednesday, August 25, 2021 3:53:37 PM

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**[WARNING: External Email]**

Rachel,

11:30 ET on Friday would work for me. As an FYI my client will be listening in on the call.

Regards,

Keith

Atty. Keith A. Mathews  
1000 Elm Street, Suite 800  
Manchester, NH 03101

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On 8/24/2021 7:01 PM, Brass, Rachel S. wrote:

Keith,

I am available on Thursday 8-10 PT/11-1 ET or Friday 8-11 PT/11-2 ET.  
Would one of those windows work for you? Will 30 minutes be appropriate?

Best,  
Rachel

**Rachel S. Brass**  
**Partner**

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**From:** Keith Mathews, Esq. <[keith@aaone.law](mailto:keith@aaone.law)>  
**Sent:** Tuesday, August 24, 2021 4:58 AM  
**To:** Brass, Rachel S. <[RBrass@gibsondunn.com](mailto:RBrass@gibsondunn.com)>  
**Subject:** Re: 3:21-cv-05567-EMC Coronavirus Reporter et al v. Apple Inc. et al

[WARNING: External Email]

Rachel,

As expected we intend to motion under Rule 11 regarding Apple's most recent filings. Please provide your availability to meet and confer.

Thanks,

Keith

Atty. Keith A. Mathews  
1000 Elm Street, Suite 800  
Manchester, NH 03101  
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On 8/9/2021 4:37 PM, Brass, Rachel S. wrote:

Dear Mr. Mathews,

An addendum to my email below. To avoid undue delay, we instead ask if you will stipulate to an extension to August 23, so that the deadline is the same as for the pending motion for preliminary injunction. Please let me know today by 5 p.m. PT.

Rachel

Rachel S. Brass

**Partner**

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**From:** Brass, Rachel S.

**Sent:** Monday, August 9, 2021 1:29 PM

**To:** 'Keith Mathews, Esq.' <[keith@aaone.law](mailto:keith@aaone.law)>

**Subject:** 3:21-cv-05567-EMC Coronavirus Reporter et al v. Apple Inc. et al

Dear Mr. Mathews,

In light of Judge Gonzalez Rogers' decision that the above-captioned case is not related to *Cameron v. Apple Inc.*, I am reaching out to inquire whether you will stipulate to a 30-day extension for Apple to file a motion to dismiss. Please let me know today by 5 p.m. PT.

We have received your other communications, and delivered them to our client, and will respond in due course.

Rachel

**Rachel S. Brass**  
**Partner**

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